

1 LYONS LAW FIRM  
2 Keith M. Lyons Jr.  
3 Nevada State Bar #004682  
4 512 South 8th Street  
5 Las Vegas, NV 89101  
6 Telephone: (702) 432-8655  
7 Facsimile: (702) 432-8715  
8 Email: klyons@lyonslawfirm.net

6 GREGORY W. STEVENS  
7 (*Admitted Pro Hac Vice*)  
8 Cottonwood Corporate Center  
9 2825 East Cottonwood Parkway  
10 Suite 500  
11 Salt Lake City, UT 84121-7060  
12 Telephone: (801) 990-3388  
13 Facsimile: (801) 606-7378  
14 Email: utlaw@aol.com

11 *Attorneys for Plaintiff*  
12 *Adrian A. Sampson*

13 **UNITED STATES DISTRICT COURT**  
14 **FOR THE DISTRICT OF NEVADA**

15  
16 ADRIAN A. SAMPSON,

17 *Plaintiff,*

18 vs.

19 IMAGE 2000, INC.,

20 *Defendant.*

Case No. 2:13-CV-01321-MMD-NJK

**STIPULATED APPLICATION TO  
EXTEND DISCOVERY DEADLINES AND  
REVISED SCHEDULING ORDER**

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22 In accordance with LR 6-1 and LR 26-4, the parties, by and through their respective  
23 counsel of record, hereby stipulate to and request that the Court extend the existing discovery  
24 cutoff deadline, the due date for dispositive motions and the due date for filing a pretrial order  
25 by 30 days. As grounds for this application, the parties state as follows:

- 26  
27 1. Discovery Completed to Date: The parties have been diligently pursuing  
28 discovery in this action. The parties have served Initial Disclosures, including,  
for both parties, the production of a substantial number of documents. The

1 Plaintiff served written discovery requests and the Defendant has responded to  
2 those requests. The Defendant also later served written discovery requests and  
3 the Plaintiff is in the process of preparing a response and collecting documents  
4 in response to those requests. Neither party has disclosed or needs to disclose  
5 an expert witness. On March 12, 2014, the parties filed an Interim Status  
6 Report, noting the potential need to extend the discovery cut-off date to  
7 accommodate the scheduling of depositions.  
8

9 2. Discovery Remaining: Depositions of the Plaintiff and personnel employed by  
10 the Defendant remains to be completed.

11 3. Reasons for Inability to Complete: The parties are in the process of completing  
12 their written discovery and document production obligations. They anticipate the  
13 need to complete approximately five depositions. Accommodating the schedules  
14 of the witnesses, many of which are out-of-State, and their counsel requires  
15 additional time beyond the date set forth in the original Scheduling Order.  
16

17 4. Discovery Plan: The parties propose the following revised discovery plan:

18 A. Discovery Cut-Off Date: **Friday, June 14, 2014.**

19 B. Dispositive Motions: All dispositive motions shall be filed no later than  
20 **Friday, July 11, 2014.**

21 C. Pretrial Order: The parties shall file a joint pretrial order no later than  
22 **Friday, August 14, 2014.** In the event that dispositive motions are filed,  
23 the date for filing the joint pretrial order shall be suspended until thirty (30)  
24 days after decision on the dispositive motion(s) or further order of the  
25 Court. The disclosure required by Federal Rule of Civil Procedure 26(a)(3)  
26 and objections thereto shall be made in the pre-trial order.  
27  
28

1  
2 Respectfully submitted this 20th day of March 2014:

3 /s/ Gregory W. Stevens  
4 GREGORY W. STEVENS  
Admitted *Pro Hac Vice*

5 KEITH M. LYONS JR.  
6 Nevada State Bar #004682  
7 512 S. 8th Street  
8 Las Vegas, Nevada 89101  
9 *Attorneys for Plaintiff*

10 APPROVED AS TO FORM AND CONTENT:

11 /s/ Berna L. Rhodes-Ford  
12 Nevada Bar No. 7879  
13 Rhodes-Ford & Associates, P.C.  
14 8485 West Sunset Road, Suite 106  
15 Las Vegas, NV 89113  
Telephone: (702) 684-6262  
Facsimile: (702) 534-4000

16 *Attorneys for Defendant*  
17 *Image 2000, Inc.*

18  
19  
20 **IT IS SO ORDERED** this 20th day of March 2014:

21  
22   
23 NANCY J. KOPPE  
24 UNITED STATES MAGISTRATE JUDGE  
25  
26  
27  
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